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Federal Public Defender  
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Counsel for Defendant HEINZ

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

vs.

STEVEN HEINZ,

Defendant.

No. CR 06-00281 JW (PVT)

**STIPULATION AND ~~PROPOSED~~  
ORDER TO CONTINUE HEARING  
DATE**

Assistant United States Attorney Jeffrey Nedrow and defendant, Steven Michael Heinz, through his counsel, Assistant Federal Public Defender Angela M. Hansen, stipulate and agree that the date set for a status hearing, May 22, 2006 at 1:30 p.m., should be continued to June 26, 2006, at 1:30 p.m.

Mr. Heinz cooperated with the government's investigation and government counsel is currently deciding on the terms of the plea agreement for Mr. Heinz. The parties stipulate and agree that the May 22, 2006 date should be continued because the parties need additional time to negotiate a disposition, and, once government counsel provides a plea agreement, counsel for Mr. Heinz will need additional time to discuss the agreement with her client. The parties further stipulate and agree that under 18 U.S.C. §§ 3161(h)(8)(A) and (B)(iv), the ends of justice served by the continuance requested outweigh the best interest of the defendant and public in a speedy trial because the failure to grant such a continuance would deny the defense the time necessary

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Dated: May 19, 2006

/S/  
ANGELA M. HANSEN  
Assistant Federal Public Defender

Dated: May 19, 2006

/S/

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JEFFREY NEDROW  
Assistant United States Attorney

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UNITED STATES OF AMERICA,

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vs.

STEVEN HEINZ,


Defendant.

No. CR 06-00281 JW (PVT)

~~PROPOSED~~ ORDER TO CONTINUE  
HEARING DATE

The parties have jointly requested to continue the status hearing, IT IS HEREBY ORDERED that the date presently set for status hearing, May 22, 2006, is continued to June 26, 2006 at 1:30 p.m. IT IS FURTHER ORDERED that the period of time from May 22 to June 26, 2006, shall be excluded from the period of time within which trial must commence under the Speedy Trial Act, 18 U.S.C §§ 3161(h)(8)(A) and (B)(iv).

Dated: May 22, 2006

  
JAMES WARE  
United States District Judge

1 Distribute to:

2 Angela M. Hansen  
3 Assistant Federal Public Defender  
4 160 West Santa Clara Street, Suite 575  
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6 Counsel for Defendant

7 Jeffrey Nedrow  
8 Assistant United States Attorney  
9 150 Almaden Blvd., Suite 900  
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11 Counsel for the United States  
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